

**McKool Smith**

 **PRYOR CASHMAN LLP**

December 19, 2024

By ECF

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 6B  
New York, New York 10007-1312

**MEMORANDUM ENDORSED**

Re: Marc Restellini v. The Wildenstein Plattner Institute, Inc.  
20 Civ. 4388 (AT) (GWG)

Dear Judge Gorenstein:

This is a joint letter submitted on behalf of all parties.

The parties have previously provided various updates regarding their settlement discussions and, based on those discussions, the Court has stayed and, thereafter, continued the stay, of various litigation-related deadlines. The most recent stay expires on December 20, 2024. See ECF No. 177, 179, 181, 183, 185, 187, 189.

Since the parties' last update to the Court, ECF No. 188, the parties have expended very significant efforts to finalize a settlement agreement. Most recently, over this past weekend, the parties conducted a two-day settlement discussion, with the assistance of the JAMS mediator who has been closely involved throughout the settlement process.

The parties are very close to finalizing a settlement agreement and are working through what they hope are final details that, they further hope, will be resolved in the coming days and weeks, recognizing that there could be some delay as a result of the holidays. Thereafter, they hope to obtain signatures.

Based on the foregoing, the parties jointly request that the Court continue the stay until January 13, 2025, to permit the parties to finalize their settlement agreement.

Respectfully submitted,

PRYOR CASHMAN LLP

*/s/ William L. Charron*

By:

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William L. Charron  
Daniel V. Derby  
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Wildenstein Plattner Institute, Inc. and  
Fonds Wildenstein Plattner Institute France  
McKool Smith P.C.

*/s/ Daniel W. Levy*


By: 

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Daniel W. Levy  
Eliza Beeney  
Attorneys for Plaintiff Marc Restellini

Granted. Report due January 13, 2025.

So Ordered.

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GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
December 20, 2024